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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

In Re:	§	
Angela Marie Higgins	§	Case No. 09-70642-hdh-13
	§	Chapter 13
Debtor	§	

DEBTOR'S MOTION TO EXTEND AUTOMATIC STAY

Comes Now Debtor, by counsel, and for this Motion state as follows:

1. Debtor filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
2. Debtor was a debtor in a prior case during the preceding year. To-wit: Chapter 13, Case No. 08-70180-HDH-13 filed on 5/13/2008.
3. Debtor seeks an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtor's prior case was dismissed for: Debtor lost her job and unemployment benefits stopped in March 2009. Debtor could not remain current with her Trustee payments.
5. The following change of circumstances demonstrate that the Debtor can perform this plan and is likely to complete the case successfully: On November 22, 2009, she became employed full time as a sales representative with KAUZ-TV. The Trustee payment will be deducted from her pay check.

WHEREFORE, Debtor requests this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,
/s/Monte J. White
Attorney for Debtor

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on December 22, 2009 on all parties on the mailing matrix:

/s/Monte J. White
Attorney for Debtor

Bank of America
Attn: Bankruptcy Dept NC4-105-0
PO Box 26012
Greensboro, NC 27420

Txu Energy
Po Box 666565 Attn Collections
Dallas, TX 75266

Chase
800 Brooksedge Blvd
Westerville, OH 43081

Verizon Wireless
618 Grassmere Park, Ste 14
Nashville, TN 37211

Citibank
Attention: Bankruptcy
PO Box 20507
Kansas City, MO 64915

Wichita Falls Teachers FCU
P.O. Box 4516
Wichita Falls, Texas 76308

Discover Financial
Attention: Bankruptcy Department
PO Box 3025
New Albany, OH 43054

IRS Special Procedures
1100 Commerce St., Room 951
Mail Stop 5029 DAL
Dallas, TX 75246

Kohls
Attn: Recovery
PO Box 3120
Milwaukee, WI 53201

Monte J. White & Associates
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Wichita Falls TX 76301

Nelnet Lns
Attention: Claims
PO Box 17460
Denver, CO 80217

Sears
Attn: Centeralized Bankruptcy
PO Box 20507
Kansas City, MO 64195

State Farm Bank
4747 W Irving Park
Chicago, IL 60641